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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

MARK AARON HAYNIE, BRENDAN  
JOHN RICHARDS, THE CALGUNS  
FOUNDATION, INC., and THE  
SECOND AMENDMENT  
FOUNDATION, INC.,

Plaintiffs,

vs.

KAMALA HARRIS, Attorney General  
of California, CALIFORNIA  
DEPARTMENT OF JUSTICE, CITY  
OF ROHNERT PARK, and OFFICER  
DEAN BECKER (RP134)

Defendants.

Case No.: 3:10-CV-01255 SI

**STIPULATION and JOINT  
ADMINISTRATIVE MOTION and  
PROPOSED ORDER**  
Re: Case Management

CURRENT CMC: SEPTEMBER 6, 2013

PROPOSED CMC: JANUARY 10, 2014

IT IS HEREBY STIPULATED by and between the parties hereto through their respective attorneys of record that the pending Case Management Conference currently set for September 6, 2013 in Courtroom 10, 19<sup>th</sup> Floor of the U.S. District Court for the Northern District of California should be reset.

The Rohnert Park Defendants and the Plaintiffs are still engaged in earnest self-directed settlement discussions.

1 If a settlement can be reached, then the remaining parties (California  
2 Department of Justice and the Plaintiffs) will proceed with setting hearing dates for  
3 dispositive motions at the next Case Management Conference.

4 Furthermore, the Plaintiffs and the California Department of Justice are  
5 aware that several bill have been introduced in the State Legislature that may  
6 moot this case or require amendments to the pleadings. Several of those bills have  
7 passed at least one legislative house and are pending in the other. Those parties  
8 may seek another continuance and/or stay to conserve resources of the parties and  
9 the Court.

10 The parties propose that the Court reset the Case Management Conference to  
11 January 10, 2014 in order to give the parties engaged in settlement discussions the  
12 time necessary to conclude that process or to request formal ADR assistance from  
13 the Court.

14 **SO STIPULATED.**

15 Date: August 28, 2013

Date: August 28, 2013

16 /s/  
17 Ross Moody, Deputy Attorney General  
18 Counsel for Defendants  
Harris & California Dept. of Justice

/s/  
Donald Kilmer,  
Counsel for Plaintiffs

19 Date: August 28, 2013

20 /s/  
21 Robert W. Henkels  
22 Counsel for Defendants  
City of Rohnert Park & Becker

23 **ATTESTATION FOR COMPLIANCE WITH GENERAL ORDER 45 AND  
24 LOCAL RULE VIII.B.**

25 I, Donald Kilmer, declare under penalty of perjury under the laws of California  
26 and the United States that I have in my possession e-mail correspondence from  
27 Ross Moody, and Robert Henkels that the content of this document is acceptable to  
all persons required to sign the document. I declare that this document was signed  
in San Jose, CA on August 28, 2013

28 /s/  
Donald Kilmer, Attorney for Plaintiffs

**ORDER**

The Case Management Conference currently set for September 6, 2013 is reset to: (Date) \_\_\_\_\_, at (Time): \_\_\_\_\_, in Courtroom 10, 19<sup>th</sup> Floor of the U.S. District Court for the Northern District of California – San Francisco. A Joint Case Management Conference Statement shall be filed seven (7) calendar days before the new date.

Date:

\_\_\_\_\_  
United States District Judge